

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

____ Division

LAQUAN Jones

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

20-CV-00693-AMD-SJB

(to be filled in by the Clerk's Office)

Jury Trial: (check one)

☐

Yes

☐

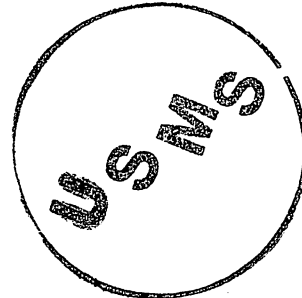
No

-v-

Roberto Ascencio, Kirk Sendlein,
Richard A. Brown, John Doe #1,
John Doe #2, John Doe #3, John Doe #4

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)



COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Address

County

Telephone Number

E-Mail Address

LAQUAN JONES
 25 B Frontenac Street
 Dorchester MA 02124
 City State Zip Code
 (718) 314-4297
 LAQUAN.J.JONES@GMAIL.COM

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Roberto Ascencio
 NYPD Detective 115
 92-15 Northern Blvd
 Jackson Heights NY 11372
 City State Zip Code
 QUEENS
 (718) 533-2002
 N/A

☐

Individual capacity

☐

Official capacity

Defendant No. 2

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

John Doe #1
 NYPD Warrent Squad
 80-45 Winchester Blvd
 Queens Village NY 11427
 City State Zip Code
 Queens
 (718) 217-8480
 N/A

☐

Individual capacity

☐

Official capacity

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Defendant No. 3

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

John Doe # 2
 NYPD Warrent Squad
 80-45 Winchester Blvd
 Queensvillage NY 11427
City State Zip Code
 Queens
 (718) 217-8480
 N/A

☐ Individual capacity ☐ Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

John Doe #3
 NYPD Warrent Squad
 80-45 Winchester Blvd
 Queensvillage NY 11427
City State Zip Code
 Queens
 (718) 217-8480
 N/A

☐ Individual capacity ☐ Official capacity

SEE
 Attachment.

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

4th Amendment, 5th Amendment, 6th Amendment,
 8th Amendment, 14th Amendment.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

(Defendant No. 5) John Doe #4
NAME
Job or title NYPD Warrent Squad
Street Address 80-45 Winchester Blvd
City and County Queensvillage, Queens
State and Zip Code New York, 11427
Telephone Number (718) 217-8480
Email Address N/A
(if known)

(Defendant No. 6) Kirk Sendlein
Name
Job or title Assistant District Attorney (Queens)
Street Address 80-02 Kew Gardens Rd
City and County Kew Gardens, Queens
State and Zip Code New York, 11415
Telephone Number (718) 286-6000
Email Address N/A
(if known)

(Defendant No. 7) Richard A Brown
Name
Job or title Queens District Attorney
Street Address 80-02 Kew Gardens Rd
City and County Kew Gardens, Queens
State and Zip Code New York, 11415
Telephone Number (718) 286-6000
Email Address N/A
(if known)

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Roberto Asencio, John Doe #1, John Doe #2, John Doe #3, John Doe #4, Kirk Sendlein and Richard A. Brown deprived me of my liberty on January 7, 2016 without →

III. Statement of Claim

See
Attachment

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

31-21 97 street East Elmhurst N.Y. 11369
92-15 Northern Blvd Jackson Heights N.Y., 11372
125-01 Queens Blvd, Kew Gardens N.Y. 11415

- B. What date and approximate time did the events giving rise to your claim(s) occur?

January 7, 2016, 11:00 AM at 31-21 97 street, East Elmhurst, Queens, New York, I was stopped, detained AND arrested by John Doe #1, John Doe #2, →

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

False Arrest, False Imprisonment, Unlawful Detention, violation of civil Rights, Violation of Constitutional Rights, Deprivation of Liberty, Negligence and Gross Negligence, Libel, Slander, Damage to Reputation, Assault and Battery, Malicious Prosecution, Intentional Infliction of Emotional Distress, Abuse of Process. Due to the negligence

SEE
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Additional
Attachment

proper warrant or cause, arrested me after saying I wasn't being arrested, never gave me a phone call, water or food after spending 8 hrs in a cell, I was transported to the Queens Central Booking and Kirk Sendlein and Richard A. Brown requested excessive bail of \$500,000, even with ~~no~~ ^{NO} felony convictions, no prior arrest, the court granted excessive bail.

I'm an African American male who was being charged for a brothel robbery that were ran by hispanics. Two (2) white males were robbed at the scene but never identified me as the robber, so I feel like I was set up as the violent robber. I spent 107 days locked and ever since this has happened to me, I feel deprived of my sleep also because I have bad prison dreams and flash backs of being woken up out my sleep just to strip naked.

John Doe #3, John Doe #4, and Roberto Ascencio then transported me to the 115th Police precinct inside of my own home without cause or proper warrant. John Doe #1 told me "relax your not being arrested, the Detective (Roberto Ascencio) will be with you shortly he just wants to ask you some questions." After 8hrs going by Roberto Ascencio comes to the cell just to say "You're being charged for robbery in the 1st degree and anything I want to know, he'll explain it to my lawyer and they will tell me what I need to know. I was confused because I didn't have a lawyer and I didn't know what was going on, I felt like my rights were violated and I was taken away from my family. I was then transported to the Queens Central Booking and at arraignment, Kirk Sendlein and Richard A. Brown requested excessive bail and in pursuant to the District Attorney, the court set high bail, as result I was incarcerated at Rikers Island Correctional facility.

I was falsely arrested, confined and subjected to non-consensual offensive touching by John Doe #1, John Doe #2, John Doe #3, John Doe #4, Roberto Ascencio and the New York City Department of Corrections. I was placed in various for hours, handcuff and deprivation of my liberty. These acts of offensive and degrading contact were committed without my consent, or just cause and constitute assault and battery. I was conscious and aware of my confinement and did not consent to same. At the time →

of the detention, arrest and incarceration there was no reasonable cause to conclude that I was the perpetrator of the crimes charged and said arrest was based upon unreliable and inconsistent statements by complainants and a highly suggestive identification procedure.

I remained in custody until April 22, 2016. On or about January 30, 2017, after one year of malicious prosecution, ~~the~~ I was exonerated of the charges when case was dismissed with prejudice between on or about January 7, 2016 and on or about April 22, 2016 the State of New York, the City of New York and the NYPD caused, allowed, permitted and condoned the release of ~~defamatory~~ defamatory and libelous statements and reported in print, radio, television and internet which exposed me to public hatred, contempt, ridicule and disgrace, which statements were false and that Defendant made said statements either knowing said statements were false or with reckless disregard of the truth or falsity of the statements, and I sustained damage causally related to these defamatory and libelous statements and writings.

carelessness, recklessness and intentional acts of Roberto Iscencio, John Doe #1, John Doe #2, John Doe #3, John Doe #4, Kirk Sendlein and Richard A. Brown in the apprehension, detention, arrest, incarceration and prosecution of me (LaQuan Jones) without just cause or legal basis, which arrest took place on or about January 30, 2016 around ~~11:00~~ 11:00 am and custody and incarceration continued through on or about April 22, 2016, whereupon my case was dismissed with prejudice by Richard A. Brown and Kirk Sendlein (Queens District Attorney) on January 30, 2017. I was released from custody on or about April 22, 2016.

The City and State of New York was careless, reckless and negligent in hiring, training and ~~supervising~~ supervising their employees (Roberto Iscencio, John Doe #1, John Doe #2, John Doe #3, John Doe #4, Kirk Sendlein, Richard A. Brown) and in creating or failing to create proper protocols regarding the detention, arrest and prosecution of citizens where probable cause does not exist, and in particular persons similarly situated to me (LaQuan Jones), and/or failing to implement said protocols, and in permitting, condoning and ratifying such conduct by their employees and staff. —————> Next page

Further, Roberto Ascencio caused, condoned, permitted and ratified the arrest and continued prosecution of me (LAQUAN Jones) by ~~Robert~~ Kirk Sendlein A.D.A) and Richard A. Brawn (District Attorney), despite knowing of approximately seven (7) alibi witnesses knowing of conflicting statements by the complaining witnesses to the Daily News and New York Post and other press, and without a minimum of Police or prosecutorial investigation that would have shown the charges to be false, and without the release and exchange of exculpatory material to ~~me~~ me or my counsel, and by continuing the prosecution of me (LAQUAN Jones) despite additional and repeated information regarding the complainants' unreliability and false allegations, keeping me unlawfully detained and imprisoned at Rikers Island and other New York City Department of Correction facilities and causing and permitting multiple ~~strip~~ strip searches, unlawful and offensive physical contacts of me (LAQUAN Jones), and disseminating false statements and writings that identified me (LAQUAN Jones) as a violent robber. Roberto Ascencio, Kirk Sendlein, ~~Robert~~ Richard A. Brawn, John Doe #1, John Doe #2, John Doe #3, John Doe #4 was negligent and grossly negligent in their investigation of the facts underlying the basis for my arrest and had no reasonable

Next page

cause to believe that I had committed the act's charge due to the information in existence and available to the District Attorney's Office at the time of my arrest and throughout the continued prosecution of the action. After my arrest, Kirk Sendlin and Richard A. Brown requested high bail despite conflicting statements by the complainants to the press and police and a highly unreliable identification procedure, said bail request was intentionally designed to keep me incarcerated during the prosecution. The criminal prosecution and action was commenced and continued with malice and intent. On January 30, 2017, the action was dismissed with prejudice.

Witness # 1: NaQuitta Jones (cousin) was present when John Doe #1, John Doe #2, John Doe #3, John Doe #4 walked into my home and didn't show us any warrants at the time they were inside of the house.

Witness # 2: Edward Caldwell (cousin) came to my house around ~~10:00~~ 10:00 am on January 7, 2016 and seen me arguing with John Doe #1, John Doe #2, John Doe #3, John Doe #4 for about 30 minutes until the officers threaten to lock him up if he didn't leave.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Mental anguish, humiliation, psychological injuries, stress, prison nightmares, anger

- I haven't received any counseling because I thought I didn't need it until I realized I wasn't acting the same and became moody. I plan on seeking the help I need
- I did anger management while incarcerated at Rikers Island.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I want the courts to look into my case and see I was and still am an innocent man and hold every person accountable for the loss and suffering of my freedom. I suffered from the deprivation of my freedom, loss of liberty, damage and loss of reputation and business reputation, incurred legal fees, costs, and other incurred damages to which I (LAQUAN JONES) is entitled to by case law statute. Said damages are continuing and ongoing. I (LAQUAN JONES) make claim

see
Attachments

for damages in the amount of Ten Million dollars (10,000,000.00). I (LaQuan Jones) makes claim for punitive damages to the extent permitted by law.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

4/30/2020

Signature of Plaintiff

Printed Name of Plaintiff

Laquan Jones
LAQUAN JONES

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

To: Judge Ann M. Donnelly

I'm writing this letter on behalf of myself so you could understand why it took me three years to file my complaint in the federal court. I had a lawyer in the beginning when I filed a notice of claim but I couldn't afford to keep paying for him to try and fight this civil complaint so I spent time trying to look for a firm that would take the case but no one would take the case so I found out I could file the complaint in federal court as pro se, that's when I gathered my ~~info~~ information and filed it at the eastern district court.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

____ Division

LAQUAN Jones

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Roberto Ascencio, Kirk Sandlein,
Richard A. Brown, John Doe #1,
John Doe #2, John Doe #3, John Doe #4

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Case No.

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(to be filled in by the Clerk's Office)

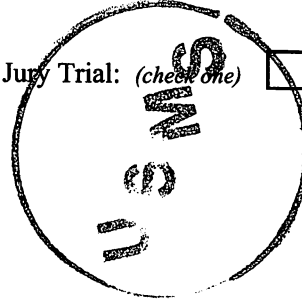
Jury Trial: (check one)

☐

Yes

☐

No



COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

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Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Address

County

Telephone Number

E-Mail Address

LAQUAN JONES
 25 B Frontenac Street
 Dorchester MA 02124
City State Zip Code

(718) 314-4297
 LAQUAN.JONES@GMAIL.COM

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Roberto Ascencio
 NYPD Detective 115
 92-15 Northern Blvd
 Jackson Heights NY 11372
City State Zip Code

Queens
 (718) 533-2002
 N/A

☐ Individual capacity ☐ Official capacity

Defendant No. 2

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

John Doe #1
 NYPD Warrent Squad
 80-45 Winchester Blvd
 Queens Village NY 11427
City State Zip Code

Queens
 (718) 217-8480
 N/A

☐ Individual capacity ☐ Official capacity

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Defendant No. 3

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

John Doe # 2
 NYPD Warrent Squad
 80-45 Winchester Blvd
 Queensvillage NY 11427
City State Zip Code
 Queens
 (718) 217-8480
 N/A

☐ Individual capacity ☐ Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

John Doe #3
 NYPD Warrent Squad
 80-45 Winchester Blvd
 Queensvillage NY 11427
City State Zip Code
 Queens
 (718) 217-8480
 N/A

☐ Individual capacity ☐ Official capacity

SEE
 Attachment.

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

4th Amendment, 5th Amendment, 6th Amendment,
 8th Amendment, 14th Amendment.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

(Defendant No. 5) (THE Defendants B part 2)

NAME John Doe #4
Job or title NYPD Warrent Squad
Street Address 80-45 Winchester Blvd
City and County Queensvillage, Queens
State and Zip Code New York, 11427
Telephone Number (718) 217-8480
Email Address
(IF KNOWN) N/A

(Defendant No. 6)

Name Kirk Sendlein
Job or title Assistant District Attorney (Queens)
Street Address 80-02 Kew Gardens Rd
City and County Kew Gardens, Queens
State and Zip Code New York, 11415
Telephone Number (718) 286-6000
Email Address
(IF KNOWN) N/A

(Defendant No. 7)

Name Richard A Brown
Job or title Queens District Attorney
Street Address 80-02 Kew Gardens Rd
City and County Kew Gardens, Queens
State and Zip Code New York, 11415
Telephone Number (718) 286-6000
Email Address
(IF KNOWN) N/A

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Roberto Asencio, John Doe #1, John Doe #2, John Doe #3, John Doe #4, Kirk Sendlein and Richard A. Brown deprived me of my liberty on January 7, 2016 without →

See Attachment

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

31-21 97 street East Elmhurst N.Y. 11369
92-15 Northern Blvd Jackson Heights N.Y., 11372
125-01 Queens Blvd, Kew Gardens N.Y. 11415

- B. What date and approximate time did the events giving rise to your claim(s) occur?

January 7, 2016, 11:00 AM at 31-21 97 street, East Elmhurst, Queens, New York, I was stopped, detained AND arrested by John Doe #1, John Doe #2, →

SEE Attachment

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

False Arrest, False Imprisonment, Unlawful Detention, Violation of civil Rights, Violation of Constitutional Rights, Deprivation of Liberty, Negligence and Gross Negligence, Libel, Slander, Damage to Reputation, Assault and Battery, Malicious Prosecution, Intentional Infliction of Emotional Distress, Abuse of Process. Due to the negligence

SEE Additional Attachments

(Section D) (Page 1)
proper warrant or cause, arrested me after saying I wasn't being arrested, never gave me a phone call, water or food after spending 8 hrs in a cell, I was transported to the Queens Central Booking and Kirk Sendlein and Richard A. Brown requested excessive bail of \$500,000, even with ~~no~~ ^{NO} felony convictions, no prior arrest, the court granted excessive bail.

I'm an African American male who was being charged for a brothel robbery that were ran by hispanics. Two (2) white males were robbed at the scene but never identified me as the robber, so I feel like I was set up as the violent robber. I spent 107 days locked and ever since this has happened to me, I feel deprived of my sleep also because I have bad prison dreams and flash backs of being woken up out my sleep just to strip naked.

(Part 2 statement of Claim(B)) (1)

John Doe #3, John Doe #4, and Roberto Ascencio then transported to the 115th Police precinct inside of my own home without cause or proper warrant. John Doe #1 told me "Relax your not being arrested, the Detective (Roberto Ascencio) will be with you shortly he just wants to ask you some questions." After 8hrs going by Roberto Ascencio comes to the cell just to say "You're being charged for robbery in the 1st degree and anything I want to know, he'll explain it to my lawyer and they will tell me what I need to know. I was confused because I didn't have a lawyer and I didn't know what was going on, I felt like my rights were then transported to the Queens Central family. I was then transported to the Queens Central Booking and at arraignment, Kirk Sendlein and Richard A. Brown requested excessive bail and in pursuant to the District Attorney, the court set high bail, as result I was incarcerated at Rikers Island correctional facility.

I was falsely arrested, confined and subjected to non-consensual offensive touching by John Doe #1, John Doe #2, John Doe #3, John Doe #4, Roberto Ascencio and the New York City Department of corrections. I was placed in various for hours, handcuffs, searches including strip searches and deprivation of my liberty. These acts of offensive and bodily contact were committed without my consent, or just cause and constitute assault and battery. I was conscious and aware of my confinement and did not consent to same. At the time

of the detention, arrest and incarceration there was no reasonable cause to conclude that I was the perpetrator of the crimes charged and said arrest was based upon unreliable and inconsistent statements by complainants and a highly suggestive identification procedure.

I remained in custody until April 22, 2016. On or about January 30, 2017, after one year of malicious prosecution, ~~the~~ I was exonerated of the charges when case was dismissed with prejudice. Between on or about January 7, 2016 and on or about April 22, 2016 the State of New York, the City of New York and the NYPD caused, allowed, permitted and condoned the release of ~~defamatory~~ defamatory and libelous statements and reported in print, radio, television and internet which exposed me to public hatred, contempt, ridicule and disgrace, which statements were false and that Defendant made said statements either knowing said statements were false or with reckless disregard of the truth or falsity of the statements, and I sustained damages causally related to these defamatory and libelous statements and writings.

Carelessness, recklessness and intentional acts of Roberto Ascencio, John Doe #1, John Doe #2, John Doe #3, John Doe #4, Kirk Sendlein and Ricard A. Brown in the apprehension, detention, arrest, incarceration and prosecution of me (LaQuan Jones) without just cause or legal basis, which arrest took place on or about January 30, 2016 around ~~11:00~~ 11:00 am and custody and incarceration continued through on or about April 22, 2016, whereupon my case was dismissed with prejudice by Richard A. Brown and Kirk Sendlein (Queens District Attorney) on January 30, 2017. I was released from custody on or about April 22, 2016.

The City and State of New York was careless, reckless and negligent in hiring, training and ~~supervising~~ supervising their employees (Roberto Ascencio, John Doe #1, John Doe #2, John Doe #3, John Doe #4, Kirk Sendlein, Richard A. Brown) and in creating or failing to create proper protocols regarding the detention, arrest and prosecution of citizens where probable cause does not exist, and in particular persons similarly situated to me (LaQuan Jones), and/or failing to implement said protocols, and in permitting condoning and ratifying such conduct by their employees and staff. —————> Next Page

Further, Roberto Ascencio caused, condoned, permitted and ratified the arrest and continued prosecution of me (LaQuan Jones) by ~~Robert~~ Kirk Sendlein (A.D.A) and Richard A. Brawn (District Attorney), despite knowing of approximately seven (7) alibi witnesses knowing of conflicting statements by the complaining witnesses to the Daily News and New York Post and other press, and without a minimum of Police or prosecutorial investigation that would have shown the charges to be false, and without the release and exchange of exculpatory material to ~~me~~ me or my counsel, and by continuing the prosecution of me (LaQuan Jones) despite additional and repeated information regarding the complainants' unreliability and false allegations, keeping me unlawfully detained and imprisoned at Rikers Island and other New York City Department of Correction facilities and causing and permitting multiple ~~strip~~ strip searches, unlawful and offensive physical contacts of me (LaQuan Jones), and disseminating false statements and writings that identified me (LaQuan Jones) as a violent robber. Roberto Ascencio, Kirk Sendlein, ~~Robert~~ Richard A. Brawn, John Doe #1, John Doe #2, John Doe #3, John Doe #4 was negligent and grossly negligent in their investigation of the facts underlying the basis for my arrest and had no reasonable

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(Statement of claim part C) (page 3)
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cause to believe that I had committed the acts charged due to the information in existence and available to the District Attorney's Office at the time of my arrest and throughout the continued prosecution of the action. After my arrest, Kirk Sandlin and Richard A. Brown requested high bail despite conflicting statements by the complainants to the press and police and a highly unreliable identification procedure, said bail request was intentionally designed to keep me incarcerated during the prosecution. The criminal prosecution and action was commenced and continued with malice and intent. On January 30, 2017, the action was dismissed with prejudice.

Witness # 1: NaQuitta Jones (cousin) was present when John Doe #1, John Doe #2, John Doe #3, John Doe #4 walked into my home and didn't show us any warrants at the time they were inside of the house.

Witness # 2: Edward Caldwell (cousin) came to my house around ~~10:00~~ 10:00 am on January 7, 2016 and seen me arguing with John Doe #1, John Doe #2, John Doe #3, John Doe #4 for about 30 minutes until the officers threaten to lock him up if he didn't leave.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Mental anguish, humiliation, psychological injuries, stress, prison nightmares, anger

- I haven't received any counseling because I thought I didn't need it until I realized I wasn't acting the same and became moody. I plan on seeking the help I need
- I did anger management while incarcerated at Rikers Island.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I want the courts to look into my case and see I was and still am an innocent man and hold every person accountable for the loss and suffering of my freedom. I suffered from the deprivation of my freedom, loss of liberty, damage and loss of reputation and business reputation, incurred legal fees, costs, and other incurred damages to which I (LAQUAN JONES) is entitled to by case law statute. Said damages are continuing and ongoing. I (LAQUAN JONES) make claim

↓
see
Attachments

(Part V Relief) (Page 1)

For damages in the amount of Ten Million dollars (10,000,000.00). I (LaQuan Jones) makes claim for punitive damages to the extent permitted by law.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 4/30/2020

Signature of Plaintiff

Printed Name of Plaintiff

Laquan Jones
LAQUAN JONES

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

To: Judge Ann M. Donnelly

I'm writing this letter on behalf of myself so you could understand why it took me three years to file my complaint in the federal court. I had a lawyer in the beginning when I filed a notice of claim but I couldn't afford to keep paying for him to try and fight this civil complaint so I spent time trying to look for a firm that would take the case but no one would take the case so I found out I could file the complaint in federal court as pro se, that's when I gathered my ~~info~~ information and filed it at the eastern district court.